

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Cassandra Yip aka Cassandra Johnson  
Debtor

CASE NO.: 24-13511

CHAPTER 13

Fay Servicing, LLC as servicer for U.S.  
Bank Trust National Association, not in  
its individual capacity but solely as  
Trustee of Mill City Mortgage Loan  
Trust 2021-NMR1  
v.

Judge: Ashely M. Chan

Cassandra Yip aka Cassandra Johnson  
Kenneth E. West - Bankruptcy Trustee  
Respondents

**CERTIFICATION OF DEFAULT OF MOTION FOR RELIEF FROM AUTOMATIC  
STAY**

FRIEDMAN VARTOLO, LLP, attorneys for Movant, hereby certifies that the above-captioned Debtors have failed to comply with the terms of the Stipulation resolving Motion for Relief from Stay approved by the U.S. Bankruptcy Judge Ashely M. Chan on March 5, 2025. A copy of the Stipulation is attached hereto as **Exhibit “A”**.

Movant certifies that the required Notice of Default required by the Order was sent to Debtor and Debtor’s attorney on June 9, 2025 and Debtor has failed to cure the default. A copy of the Notice of Default is attached hereto as **Exhibit “B”**.

In accordance with the terms of said Stipulation agreed to by the parties, the Automatic Stay is hereby lifted as to permit Movant to proceed with their State Court remedies upon Debtor's property.

Dated: June 26, 2025

By: /s/ Lauren M. Moyer

Lauren M. Moyer, Esq.

**FRIEDMAN VARTOLO LLP**

Attorneys for Fay Servicing, LLC as servicer for  
U.S. Bank Trust National Association, not in its  
individual capacity but solely as Trustee of Mill  
City Mortgage Loan Trust 2021-NMR1

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